

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
 )  
 v. ) No.: 16-cr-10305-NMG  
 )  
 MARTIN GOTTESFELD )

## MOTION FOR LEAVE TO WITHDRAW

Counsel for defendant Martin Gottesfeld (“Mr. Gottesfeld”) hereby files this motion for leave to withdraw. As grounds, an irreparable breakdown in the attorney-client relationship has occurred. In support, counsel files under seal and *ex parte* four (4) exhibits to this Motion. Mr. Gottesfeld indicates he does not assent to counsel’s withdrawal.

Counsel respectfully requests a hearing on this motion, at which time, and as necessary, additional grounds may be cited.

Respectfully submitted,  
Counsel for defendant:

/s/ David J. Grimaldi

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DATE: June 28, 2018

## CERTIFICATE OF SERVICE

I, David J. Grimaldi, hereby certify that true copies of this motion were served on all registered participants via CM/ECF this 28th day of June, 2018. Further, on this day a copy of this motion was mailed to defendant Martin Gottesfeld at the Plymouth County Correctional Facility, 26 Long Pond Road, Plymouth, MA 02360. As the exhibits are filed under seal and *ex parte*, those items have not been served at this time; counsel will serve copies of the exhibits to identified parties if so ordered by the Court.

/s/ David J. Grimaldi

David J. Grimaldi